Embarq Minnesota, Inc. d/b/a CenturyLink

Study Area - 361456

Targeted Engagement Efforts

As part of its efforts to strengthen positive relationships with the Tribal Nations within its serving territory while fulfilling obligations set forth in Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, Embarq Minnesota, Inc. d/b/a CenturyLink ("CenturyLink") extended an invitation to the tribal entities to meet and address issues of importance related to the provisioning of services on tribal lands. The purpose of these meetings was to discuss planning and potential deployment of service as well as other areas of interest specific to conducting business on tribal lands (as set forth in 47 C.F.R. §54.313(a)(9)) which at a minimum, would include:

- (i) A needs assessment and deployment planning with a focus on tribal community anchor institutions;
- (ii) Feasibility and sustainability planning;
- (iii) Marketing services in a culturally sensitive manner;
- (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- (v) Compliance with tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that tribal and non-tribal business entities, whether located on or off tribal lands, must obtain upon application to the relevant tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, tribal members, or tribal lands. These include certificates of public convenience and necessity, tribal business licenses, master licenses, and other related forms of tribal government licensure.

Correspondence Resulting from Targeted Engagement Efforts

No response was received as a result of the November 18, 2014 letters to the tribal entities.

EXHIBITS – Letters Extending Invitation to Meet

- 1. Exhibit MN EQ-1 Initial Letter to the Prairie Island Indian Community in the State of Minnesota
- 2. Exhibit MN EQ-2 Initial Letter to the Upper Sioux Community, Minnesota

Exhibit MN EQ-1



JoAnn Hanson Vice President Regulatory Affairs (612) 663-5989

November 18, 2014

Ronald Johnson, President Prairie Island Indian Community 5636 Sturgeon Lake Rd Welch, MN 55089-9635

Dear President Johnson:

CenturyLink values its relationship with the Prairie Island Indian Community and the opportunity to provide services that meet the needs of CenturyLink's customers located on Tribal lands. CenturyLink is striving to maintain a positive relationship with members of the Prairie Island Indian Community through ongoing communications and, as appropriate, periodic meetings.

In late 2011, the Federal Communications Commission ("FCC") initiated steps to reform and modernize the federal universal service support system to ensure that robust, affordable voice and broadband service are available to Americans throughout the nation including those residing on Tribal lands. In accord with the FCC's actions, late last year CenturyLink requested a meeting with representatives of your Tribal Government/Council to discuss the planning and potential deployment of services on Tribal lands as well as other areas of interest specific to conducting business on your Tribal lands. The FCC has advised that the following topics may be discussed: (1) deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services on Tribal lands; (4) rights-of-way processes, land use permitting, facilities siting, environmental and cultural preservation review process; and (5) Tribal business and licensing requirements.

200 South 5th Street, Room 2200 Minneapolis, MN 55402 www.centurylink.com

¹ In the Matter of Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (rel. Nov. 18, 2011) (USF/ICC Transformation Order). The USF/ICC Transformation Order can be accessed on the FCC's website via the following weblink: http://fjallfoss.fcc.gov/edocs public/attachmatch/FCC-11-161A1 Rcd.pdf.

Ronald Johson, President Page 2 November 18, 2014

In furthering our goal of strong cooperative relationships with our Tribal customers, and the FCC's goal of comprehensive engagement with Tribal authorities regarding telecommunications services, CenturyLink would like to once again extend an opportunity to meet with the Prairie Island Indian Community at your convenience.

For your convenience, I am attaching a reply form and envelope to facilitate the return of your response. The reply provides the opportunity for you to identify the Tribal representatives that would attend the meeting as well as identify issues of interest to you regarding CenturyLink and the services we provide. Please respond at your earliest convenience so that we can get a meeting date scheduled. My office will coordinate the scheduling of our face-to-face meeting and work to identify additional CenturyLink personnel as needed to address your specific issues.

Please contact me at 612.663.5989 or <u>joann.hanson@centurylink.com</u> with any questions you may have regarding this letter. We at CenturyLink look forward to meeting with Prairie Island Indian Community and to continuing a strong relationship that is beneficial to all involved.

Thank you for your attention.

Very truly yours,

JoAnn Hanson

JH/bardm

Enclosure

Tribal Outreach Checklist

Tribal Contact Information	
Tribe/Pueblo Name:	Prairie Island Indian Community
Contact Name:	Ronald Johnson
Contact Position:	President
Contact Phone No.:	651.385.2554
Date Initial Contact:	

Response to Outreach Requests	
Date of Response:	
If no response, date of Follow-up:	
Outcome of Follow- up if any:	

Meeting Attendance		
Date:		
List of those in attendance:		

Needs Assessment for Tribal Community Anchor Institutions	
Services currently offered	
Deployment plans on Tribal land	
Timeline for provision of services on Tribal lands	
Opportunities to partner with Tribal Authorities	

Feasibility and Sustainability Planning	
Coordinate logistics of providing communications services on Tribal lands	
Address economics, remoteness, and deployment priorities	

Marketing Solutions	
Coordination	
ensuring services are	
marketed in manner	
rleating directly to	
community	
stimulating adoption	
of services on Tribal	
lands	
Developing	
materials, separately	
or jointly, specific to	
the Tribal	
community.	
Identify Issues of	
importance to Tribal	
government and	
CenturyLink	
Determine	
departments that	
need to be engaged	
(customer service,	
technical assistance,	
commercial	
business)	
Other marketing	
service discussion	

Compliance with Tribal Business and Licensing Requirements	
Tribal and business	
licensing	
requirements	
Rights-or-Way Issues	
Land use Permitting	
Facilities Siting	
Environmental	
Reviews Cultural	
Preservations	
Reviews	
	Follow up Items



Reply to CenturyLink's Request for Meeting

CenturyLink Representative's Contact Information	
Name:	JoAnn Hanson
Title:	Vice President, Regulatory Affairs
Phone Number:	612.663.5989
Address:	200 S. 5 th St.; Minneapolis, MN 55402
Email:	Joann.hanson@centurylink.com

Primary Tribal Representative's Contact Information – Prairie Island Indian Community

Traine.	
Title:	
Phone Number:	
Address:	
Email:	
Addit	tional Tribal Representative's Contact Information (If needed)
Name:	
Title:	
Phone Number:	
Address:	
Email:	
Name:	
Title:	
Phone Number:	
Address:	
Email:	
Name:	
Title:	
Phone Number:	

Address: Email:

Proposed Dates for Face-to-Face Meeting(s)	
When:	
Where:	
Alternative Dates:	

Tentative Agenda/Topics for Discussion for Proposed Meeting
Please Return This Completed Form To:
Thouse neturn time completed form for
JoAnn Hanson
Vice President, Regulatory Affairs
CenturyLink
200 S. 5 th St.; Minneapolis, MN 55402
Fax: 612.672.8911
Joann.hanson@centurylink.com

Exhibit MN EQ-2



JoAnn Hanson Vice President Regulatory Affairs (612) 663-5989

November 18, 2014

Kevin Jensvold, Chairman Upper Sioux Community P.O. Box 147 Granite Falls, MN 56241-0147

Dear Chairman Jensvold:

CenturyLink values its relationship with the Upper Sioux Community and the opportunity to provide services that meet the needs of CenturyLink's customers located on Tribal lands. CenturyLink is striving to maintain a positive relationship with members of the Upper Sioux Community through ongoing communications and, as appropriate, periodic meetings.

In late 2011, the Federal Communications Commission ("FCC") initiated steps to reform and modernize the federal universal service support system to ensure that robust, affordable voice and broadband service are available to Americans throughout the nation including those residing on Tribal lands. In accord with the FCC's actions, late last year CenturyLink requested a meeting with representatives of your Tribal Government/Council to discuss the planning and potential deployment of services on Tribal lands as well as other areas of interest specific to conducting business on your Tribal lands. The FCC has advised that the following topics may be discussed: (1) deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services on Tribal lands; (4) rights-of-way processes, land use permitting, facilities siting, environmental and cultural preservation review process; and (5) Tribal business and licensing requirements.

¹ In the Matter of Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (rel. Nov. 18, 2011) (USF/ICC Transformation Order). The USF/ICC Transformation Order can be accessed on the FCC's website via the following weblink: 200 South 5th Street, Room 2200 http://fjallfoss.fcc.gov/edocs_public/attachmatch/FCC-11-161A1_Rcd.pdf.

Kevin Jensvold, Chairman Page 2 November 18, 2014

In furthering our goal of strong cooperative relationships with our Tribal customers, and the FCC's goal of comprehensive engagement with Tribal authorities regarding telecommunications services, CenturyLink would like to once again extend an opportunity to meet with the Upper Sioux Community at your convenience.

For your convenience, I am attaching a reply form and envelope to facilitate the return of your response. The reply provides the opportunity for you to identify the Tribal representatives that would attend the meeting as well as identify issues of interest to you regarding CenturyLink and the services we provide. Please respond at your earliest convenience so that we can get a meeting date scheduled. My office will coordinate the scheduling of our face-to-face meeting and work to identify additional CenturyLink personnel as needed to address your specific issues.

Please contact me at 612.663.5989 or joann.hanson@centurylink.com with any questions you may have regarding this letter. We at CenturyLink look forward to meeting with Upper Sioux Community and to continuing a strong relationship that is beneficial to all involved.

Thank you for your attention.

Very truly yours,

JoAnn Hanson

JH/bardm

Enclosure

Tribal Outreach Checklist

Tribal Contact Information	
Tribe/Pueblo Name:	Upper Sioux Community
Contact Name:	Kevin Jensvold
Contact Position:	Chairman
Contact Phone No.:	320.564.3853
Date Initial Contact:	

	Response to Outreach Requests
Date of Response:	
If no response, date of Follow-up:	
Outcome of Follow- up if any:	

Meeting Attendance	
Date:	
List of those in attendance:	

Needs Assessment for Tribal Community Anchor Institutions	
Services currently offered	
Deployment plans on Tribal land	
Timeline for provision of services on Tribal lands	
Opportunities to partner with Tribal Authorities	

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Coordinate logistics of providing communications services on Tribal lands	
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of services on Tribal	
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or jointly, specific to	
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government and	
CenturyLink	
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need to be engaged	
(customer service,	
technical assistance,	
commercial	
business)	
Other marketing	
service discussion	

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Tribal and business	
licensing	
requirements	
Rights-or-Way Issues	
Land use Permitting	
Facilities Siting	
Environmental	
Reviews Cultural	
Preservations	
Reviews	
	Follow up Items



Reply to CenturyLink's Request for Meeting

CenturyLink Representative's Contact Information	
Name:	JoAnn Hanson
Title:	Vice President, Regulatory Affairs
Phone Number:	612.663.5989
Address:	200 S. 5 th St.; Minneapolis, MN 55402
Email:	Joann.hanson@centurylink.com

Primary Trik	pal Representative's Contact Information – Upper Sioux Community
Name:	
Title:	
Phone Number:	
Address:	
Email:	
Addit	ional Tribal Representative's Contact Information (If needed)
Name:	
Title:	
Phone Number:	
Address:	
Email:	
Name:	
Title:	
Phone Number:	
Address:	
Email:	
Name:	
Title:	
Phone Number:	
Address:	
Emaile	

Proposed Dates for Face-to-Face Meeting(s)	
When:	
Where:	
Alternative Dates:	

Tentative Agenda/Topics for Discussion for Proposed Meeting
Please Return This Completed Form To:
Thouse neturn time completed form for
JoAnn Hanson
Vice President, Regulatory Affairs
CenturyLink
200 S. 5 th St.; Minneapolis, MN 55402
Fax: 612.672.8911
Joann.hanson@centurylink.com

CenturyLink, Inc. has over 100 local exchange carriers (LECs) that serve as eligible telecommunications carriers (ETCs) providing Lifeline discounts on local telephone service for qualifying low-income customers in thirty-seven states. Each LEC's tariff or local terms of service contain the terms and conditions of voice telephony service plans generally available to CenturyLink residential customers. Lifeline provides discounts on CenturyLink residential service plans that include voice telephony service. Lifeline discounts provided to qualified recipients include the \$9.25 per month federal discount plus state discounts, if available. Tribal Lifeline recipients receive an additional federal Lifeline discount of up to \$25 per month. Eligible residents residing on Tribal lands in areas where CenturyLink receives universal service high-cost support can also receive a Tribal Link Up credit of not more than \$100 against one customary service initiation fee at a primary residence.

CenturyLink's flat-rated residential service plans provide unlimited local calling. Lifeline discounts also may be applied to local residential service plans that include a certain amount of local minutes or calls at a flat-rate and then have additional charges for minutes or calls beyond those included in the plan. Lifeline discounts may be applied to bundled service packages that include voice telephony services, such as bundles with internet service and/or video service. Lifeline discounts may also apply to voice service plans that include optional calling features such as caller ID, call waiting, and voicemail.

Toll service is available to customers receiving Lifeline discounts in the same manner that it is available to non-Lifeline customers. Toll limitation service is available to Lifeline customers at no charge.

Information concerning CenturyLink's Lifeline program can be found on our Lifeline web page at http://www.centurylink.com/Pages/Support/LifeLine/

A link to the CenturyLink tariff or local terms of service that includes the terms and conditions of this ETC's Lifeline offering is included in response to line 1220.

NOTES:

- 1. (112) (118) The Federal Communications Commission in FCC DA 14-591 adopted May 1, 2014 and in Connect America Fund et al. WC Docket No. 10-90 et al., Order, 28 FCC Rcd 2051, 2054, para. 8 (Wireline Comp. Bur. 2013) (ETC Reporting Requirements Order) waived the requirement that price cap recipients of frozen support or incremental support file five-year plans stating, "until the [Connect America Phase II forward-looking] cost model is adopted and incumbents have the opportunity to accept a state-level commitment, it does not serve the public interest." Since the Connect America Phase II program has not been fully implemented at this time, the five year plan is not required.
- 2. (220) Outages are reported using the criteria provided in 47 C.F.R. §54.313, which differs from the criteria in 47 C.F.R. §4.5 which is the basis for reporting outages to the Federal Communications Commission. Therefore, some outages may not have NORS numbers.
- 3. (220) CenturyLink experienced an unprecedented outage of 911 services in Washington, Minnesota, and North Carolina in April 2014 which ultimately resulted in CenturyLink implementing additional proactive risk management processes designed to reduce the likelihood of any future 911 system failures.
- 4. (300) (310) CenturyLink is reporting any outstanding requests for voice service from 2014 that are unfulfilled at the time of this filing.
- 5. (320) (330) CenturyLink is reporting any outstanding requests for broadband service from 2014 that are unfulfilled at the time of this filing.
- 6. (410) (420) Complaints per 1,000 voice access lines are reported as complaints to any federal and/or state agencies.
- 7. (440) (450) Complaints per 1,000 broadband customers are reported as complaints to any federal and/or state agencies.
- 8. (711) CenturyLink is reporting a-la-cart and data only broadband rates that meet or exceed both the required download speeds of four mega bits per second and upload speeds of one mega bit per second. Widely used upload speeds of 768K or below are not included in this report.
- 9. (800), (810)-(813), (1200), and (1210)-(1223) CenturyLink is a designated eligible telecommunications carrier that receives Universal Service Support for High Cost Areas under 47 C.F.R. 54 subpart D. Therefore, CenturyLink is only subject to subpart (a) of 47 C.F.R. §54.422 as it applies to this filing.
- 10. (810) (813) Per FCC DA 13-1707 released August 6, 2013, CenturyLink is reporting holding company, operating companies, and affiliates (as defined under section 3 of the Communications Act of 1934, as amended, 47 U.S.C. § 153(2)) that are designated as eligible telecommunications carriers and/or that provide retail broadband internet access to end-user customers.

- 11. (921) (929) To the extent the carrier serves federally recognized tribal lands, the attached narrative, in response to line 920, should be relied on to describe tribal outreach and interaction. If the carrier at least offered to discuss the points listed in 47 C.F.R. §54.313(a)(9) to the federally recognized tribes served in a study area, lines 921-929 were marked with a "yes" response.
- 12. (1000) (1010) Carriers must certify that their local rates are at or below two standard deviations of the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau. Qwest Corporation d/b/a CenturyLink (Wyoming) and United Telephone Company of the West d/b/a CenturyLink (Wyoming) have certain exchanges with explicit cost based local rates above this standard. Customers in such exchanges receive a Federal Universal Service credit and/or a State Universal Service credit explicitly on their bill. This results in a net charge that is lower than two standard deviations of the applicable national average urban rate for voice service.
- 13. (2000), (2005), (2010), (2014), and (2016) Per FCC DA 13-2101 released October 30, 2013, CenturyLink is certifying at a holding company level.
- 14. (2010) The Connect America Fund Incremental Support program (Round 1) requires participating carriers to deploy broadband services at certain speeds to locations within certain timeframes. The FCC recognized in DA 12-1155 released on July 18, 2012, that carriers may run into practical obstacles that would make it difficult to deploy broadband to the locations that were in the carrier's original deployment plan, and therefore may deploy to eligible locations not identified in the deployment plan. CenturyLink companies participating in the Connect America Fund Incremental Support program (Round 1) experienced the practical obstacles the FCC anticipated, and therefore deployed broadband to a substantial number of locations that are not listed in the notice of acceptance filed with the FCC on July 24, 2012. CenturyLink will identify locations where deployment has occurred in a separate and/or subsequent filing.
- 15. (3000)-(3034) These questions are not applicable. This company is considered to be a Federal Price Cap Carrier or an affiliate associated with a Federal Price Cap Carrier for the purposes of this filing.